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10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the  
11 Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset  
12 Backed Pass-Through Certificates*

13 **UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA**

15 HSBC BANK USA, NATIONAL  
16 ASSOCIATION, AS TRUSTEE, IN TRUST  
17 FOR THE REGISTERED HOLDERS OF  
18 ACE SECURITIES CORP. HOME EQUITY  
19 LOAN TRUST, SERIES 2006-NC2, ASSET  
20 BACKED PASS-THROUGH  
CERTIFICATES,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,  
24 INC.; CHICAGO TITLE INSURANCE  
25 COMPANY; TICOR TITLE OF NEVADA,  
26 INC.; DOE INDIVIDUALS I through X; and  
ROE CORPORATIONS XI through XX,  
inclusive,

27 Defendants.

28 Case No.: 2:21-cv-01300-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO  
RESPOND TO CHICAGO TITLE  
INSURANCE COMPANY'S MOTION  
TO DISMISS [ECF No. 19]**

**[Third Request]**

27 COMES NOW Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for  
28 the Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2,  
Asset Backed Pass-Through Certificates ("HSBC Bank") and Defendant Chicago Title Insurance  
Company ("CTIC"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On July 8, 2021, HSBC Bank filed its Complaint in Eighth Judicial District Court, Case  
No. A-21- 837574-C [ECF No. 1-1];

2. On July 8, 2021, CTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On September 10, 2021, CTIC filed its Motions to Dismiss [ECF No. 19];
4. HSBC Bank’s deadline to respond to CTIC’s Motion to Dismiss is currently November 5, 2021 [ECF No. 27];
5. On November 5, 2021, the Ninth Circuit issued its Order vacating and remanding the district court’s decision granting the title insurer’s motion to dismiss in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Case No. 3:19-cv-00241-MMD-WGC, 2019 WL 5578487 (D. Nev. October 29, 2019) (“*Wells Fargo II*”). Because CTIC’s Motion to Dismiss relies, in-part, on the district court’s ruling in *Wells Fargo II*, HSBC Bank requests a two-week extension until November 19, 2021 to brief the pending issues given the Ninth Circuit’s recent order;
6. Counsel for Defendants does not oppose the requested extension;
7. This is the third request for an extension which is made in good faith and not for purposes of delay.

## IT IS SO STIPULATED.

DATED this 5<sup>th</sup> day of November, 2021.

## WRIGHT, FINLAY & ZAK, LLP

/s/ *Lindsay D. Dragon*

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Lindsay D. Dragon, Esq.

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7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff, HSBC Bank USA,

### *National Association, as Trustee in Trust*

### *the Registered Holders of ACE Securities*

*Corp. Home Equity Loan Trust, Se*

NC2, Asset Backed Pass

DATED this 5<sup>th</sup> day of November, 2021.

## SINCLAIR BRAUN LLP

/s/ *Kevin S. Sinclair*

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Nevada Bar No. 12277

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*Attorneys for Defendants Fidelity National*

*Title Group, Inc.; Chicago Title Insurance*

*Company; and Ticor Title of Nevada, Inc.*

25 IT IS SO ORDERED.

Dated this 8th day of November , 2021.

UNITED STATES DISTRICT COURT JUDGE